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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JANET L. SEI,

Plaintiff and
Counterclaim Defendant,

vs.

UNITED STATES OF AMERICA,

Defendant and
Counterclaim Plaintiff

UNITED STATES OF AMERICA,

Defendant and
Counterclaim Plaintiff,

vs.

KEITH A. SEI,

Counterclaim Defendant

Case No.04-CV-6446

Judge Blanche M. Manning

FILED

MAY 13 2005

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES' MOTION FOR ENTRY OF DEFAULT

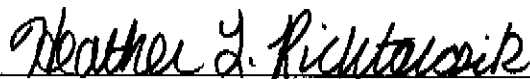
The United States of America, through Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois, moves this Court, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, for entry of default against defendant Keith A. Sei on the grounds that he has failed to plead or otherwise defend herein. The Declaration of Heather L. Richtarsik in Support of Motion for Entry of Default, with Exhibit 1, is attached hereto in support of this motion. A proposed

Entry of Default is also included.

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

JOEL NATHAN
Assistant United States Attorney


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CERTIFICATE OF SERVICE

I hereby certify that service of the forgoing Motion for Entry of Default has been made upon the following by depositing copies in the United States mail, postage prepaid, on this 12th day of May 2005, addressed to:

Paul Weatherhead
Fernholz & Ehrlich
10 S. LaSalle Street
Suite 3450
Chicago, IL 60603

Keith Sei
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